

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,  
Plaintiff,

v.

\$23,100.00 IN U.S. CURRENCY,  
Defendant *In Rem*.

Civil No.:

**VERIFIED COMPLAINT  
FOR FORFEITURE IN REM**

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* pursuant Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

**Nature of the Action**

1. This is a civil action *in rem* brought to enforce the provisions of 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C).

**Jurisdiction and Venue**

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C.

§ 1355; and over this particular action pursuant to 21 U.S.C. § 881(a)(6) and 18 U.S.C. § 981(a)(1)(C).

3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant *in rem* pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

#### **BASES FOR FORFEITURE**

4. The Defendant *In Rem* is subject to forfeiture pursuant to:
- a. 21 U.S.C. § 881(a)(6) - all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for controlled substance or listed chemical in violation of the subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter.
  - b. 18 U.S.C. § 981(a)(1)(C), which provides for the forfeiture of “[a] any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of .... any offense constituting a ‘specified unlawful activity’ (as defined in section 1956(c) (7) of this title), or a conspiracy to commit such offense.

#### **The Defendant In Rem**

5. The Defendant *In Rem* is \$23,100.00 in United States currency seized on March 22, 2022 from José Reynoso-Betancourt at the Luis Muñoz Marín International Airport in Carolina, Puerto Rico.

**Facts Supporting Forfeiture**

6. The Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Dwayjan C. Sims, a Special Agent for the United States Department of Justice, Drug Enforcement Administration.

**Claim for Relief**

7. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendant *In Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendant *In Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this \_\_\_\_ day of November 2022.

W. Stephen Muldrow  
United States Attorney

s/ Carlos J. Romo Aledo  
Carlos J. Romo Aledo  
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### VERIFIED DECLARATION

I, Carlos Romo-Aledo, Special Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Drug Enforcement Administration (DEA); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 1st day of December 2022.

s/ Carlos Romo Aledo  
Carlos Romo Aledo  
Special Assistant U.S. Attorney

### VERIFICATION

I, Dwayjan C. Sims, depose and say that I am a special agent with the United States Drug Enforcement Administration and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *In Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 1st day of December 2022.

  
\_\_\_\_\_  
Dwayjan C. Sims, Special Agent  
Drug Enforcement Administration